

FILED

MAR - 2 2022

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NATHANIEL ANTHONY BROWN-SHATTO,
and CARLOS ALBERTO CASTELLANOS, JR.,

Defendants.

4:22CR116 SRC/SRW

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but up to and including February 19, 2022 and continuing through the date of this Indictment, within the Eastern District of Missouri and elsewhere,

**NATHANIEL ANTHONY BROWN-SHATTO and
CARLOS ALBERTO CASTELLANOS, JR.,**

the defendants herein, did knowingly and intentionally conspire, confederate, combine, and agree to distribute and possess, with the intent to distribute, mixtures or substances containing detectable amounts of marijuana, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

COUNT II

The Grand Jury further charges that:

On or about February 19, 2022, in St. Louis County, within the Eastern District of Missouri,

**NATHANIEL ANTHONY BROWN-SHATTO and
CARLOS ALBERTO CASTELLANOS, JR.,**

the defendants herein, aiding, abetting, counseling, commanding, or inducing another person, did knowingly possess, brandish, and discharge one or more firearms in furtherance of the commission of the drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and possess with the intent to distribute marijuana, a Schedule I controlled substance, as charged in Count I herein.

In violation of Title 18, United States Code, Sections 2, and 924(c)(1)(A).

And in the course of this violation caused the death of Harvey Holloway through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111, in that the defendants, aiding and abetting each other and others, with malice aforethought, unlawfully killed Harvey Holloway by shooting him with a firearm, willfully, deliberately, maliciously, and with premeditation, thereby making this offense punishable under Title 18, United States Code, Sections 2 and 924(j)(1).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) or 846, as set forth in Counts I, the defendants shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the

violations.

3. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 924(c) as set forth in this Indictment, the defendants shall forfeit to the United States of America any firearm or ammunition involved in or used or intended to be used in said violations.

4. Subject to forfeiture is a sum of money equal to the total value or any property, real or personal, constituting or derived from any proceeds traceable to Defendants' offenses.

5. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

ANGIE E. DANIS, #64805MO
Assistant United States Attorney